

# Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • [emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)

November 22, 2024

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. James R. Cho, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 11D South  
Brooklyn, NY 11201-1804

**Re: IME WatchDog, Inc. v. Gelardi, et al.**  
**Case No.: 1:22-cv-1032 (PKC) (JRC)**

Dear Judge Cho:

This office, along with Milman Labuda Law Group PLLC, represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case. Plaintiff writes to respectfully request an extension of time of the deadline to provide a status report concerning Plaintiff’s motion to compel as it relates to the dispute between the parties pursuant to this Court’s Orders dated October 24, 2024 and November 18, 2024.

Plaintiff and Defendants met-and-conferred yesterday at 5:30 PM. Although Plaintiff received further documents from Defendants, the production remains deficient and Plaintiff is attempting to resolve this dispute with Defendants. As for non-parties Eugene Liddie (“Liddie”) and IME Legal Reps (“IMELR”), while they have failed to further meet-and-confer yesterday, they have represented that they will supplement their document production on Monday, December 2, 2024.

Based on the foregoing, Plaintiff respectfully submits that sufficient good cause exists for this Court to exercise its discretion in favor of granting the requested extension of time.

Dated: Lake Success, New York  
November 22, 2024

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York  
November 22, 2024

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

cc: all Counsel of Record (via ECF)